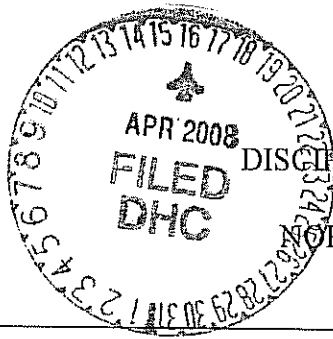


NORTH CAROLINA  
WAKE COUNTY



BEFORE THE  
DISCIPLINARY HEARING COMMISSION  
OF THE  
NORTH CAROLINA STATE BAR  
08 DHC 6

The North Carolina State Bar,  
Plaintiff,  
  
v.  
  
Sherry M. Morris,  
Attorney,  
Defendant.

**ANSWER**

As to the allegations in the Complaint, Defendant answers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted that on or about the year 1992, defendant and Ronald D. Pressley, while both were law students at North Carolina Central University School of Law, began what would become a long-term intimate relationship.
5. Admitted, upon information and belief.
6. Admitted, and by way of further answer; In late 1993, defendant became pregnant with Pressley's child and Pressley insisted that defendant terminate the pregnancy. In December 1993, Pressley and a classmate went to defendant's apartment, assaulted defendant, threatened to kill defendant's husband, children, named friends, and caused considerable damage to defendant's property, for which defendant filed criminal charges against Pressley and the classmate. Upon investigation of Pressley's application in 1995, the Board found that Pressley's disclosures and affidavits/testimony regarding his relationship with defendant and the facts and circumstances surrounding the assault and criminal charges were inconsistent with defendant's disclosures regarding the same.
7. Admitted, and by way of further answer; In January 1996, Defendant and Pressley were still seeing each other, and Defendant was at the time pregnant for the second time with Pressley's child. Prior to the hearing, Defendant continually begged Pressley to testify truthfully before the Board and fully disclose. At the hearing, defendant testified

truthfully and produced documentary evidence which contradicted much of Pressley's testimony. At the Board's hearing, Pressley and Pressley's counsel heard and cross examined defendant's testimony, however, defendant did not hear Pressley's presentation of evidence or testimony until 2004 when the 1996 transcript of the Board's hearing was produced during discovery in the Johnston County civil actions involving Pressley and defendant.

8. Admitted
9. Admitted, and by way of further answer; between 1996 and 2002, Pressley failed to establish paternity, legitimize, or provide any sort of support for his daughter, although defendant did ask Pressley more than once to establish paternity privately. Defendant continually believed that their daughter's interests would be better served by an emotional relationship with Pressley and that asking for financial support from Pressley would be detrimental to the emotional relationship.
10. Admitted, and by way of further answer; between 1996 and 2001, defendant struggled with Pressley's reluctance to spend time with their daughter, Pressley's adamant declarations that he could not "feel natural feelings" for the child because she was a constant reminder why he was not practicing law. Pressley was eligible and planned to again apply for his license in 1999, and because Pressley anticipated that defendant would again be subpoenaed to testify and would testify that their relationship had continued, and defendant's testimony would again be fatal to his license. Pressley did not submit an application in 1999, however, with Pressley's knowledge, and to appease Pressley, defendant wrote a letter to the Board in April 1999 requesting that she not be subpoenaed at a future hearing because the adversarial appearance between defendant and Pressley would be against the best interest of their daughter. As a result of defendant's refusal to untruthfully testify (consistent with Pressley), Pressley refused to see his daughter for almost nine months between January and September 1999.
11. Admitted, and by way of further answer; Pressley continued to "emotionally blackmail" and manipulate defendant by his continued threats to totally abandon their child and/or to harm himself, as he had often threatened since 1993, which on one occasion, Pressley held a revolver to his head for several hours making defendant stand by and watch, fearing that he would pull the trigger.
12. Admitted, and by way of further answer; Pressley continually reminded defendant that their relationship "had cost him everything he wanted" and his life would never be happy (or tolerable) unless and until he had his law license, and until his life was tolerable, he could not be the father to his daughter that she needed.
13. Admitted, and by way of further answer; Pressley often used his contact and relationship with his daughter (or lack thereof) as leverage in arguments with defendant to persuade defendant to act on Pressley's behalf and that defendant's decisions and/or actions would either help or hurt the chances for their daughter to have a "normal" relationship with her

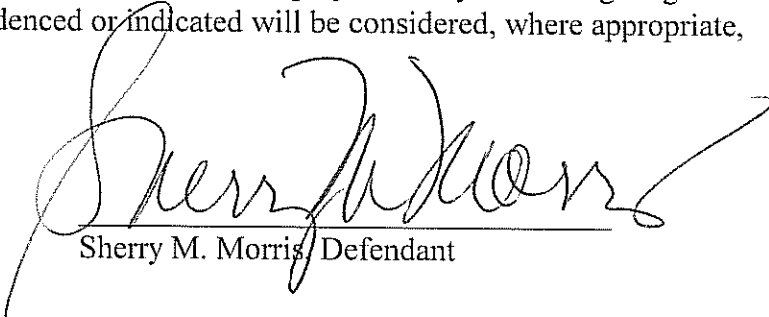
father and continued “hurdles” for Pressley would lead to total abandonment of the child.

14. Admitted.
15. Admitted.
16. Admitted, and by way of further answer; before the Board in 2007, defendant presented taped conversations between Pressley and defendant which reflected Pressley’s adamance about defendant’s potential testimony. Further, back in January 1996, unbeknownst to defendant at the time, Pressley had testified quite decidedly before the Board in 1996 that he would end the relationship with defendant and “disclose” all to his wife immediately following the Board’s hearing, which he had not done.
17. Denied to the extent that defendant was in support of Pressley’s application in 2001, otherwise, admitted. By way of further answer; the defendant and Pressley argued about the unresolved issues that would arise and be scrutinized by the Board in 2001. Further, sometime prior to the Board’s hearing in Oct 2001, Pressley told defendant after-the-fact that in June 2001 Pressley had appeared before a BOLE panel and that he had all ready stated to the panel that the sexual relationship with defendant had ended, and once again defendant was in the position to “testify against” her child’s father which would “force” him to abandon the child.
18. Admitted to the extent that prior to the hearing, Pressley and defendant discussed their testimony and that defendant would support Pressley’s given statements (before the June 2001 panel hearing) and that defendant would testify “consistent” with Pressley’s testimony. Pressley was also very concerned that he would testify prior to the defendant’s testimony, and Pressley had to be certain that defendant’s testimony would not to raise any “red flags” that would indicate inconsistencies in Pressley’s testimony. (Pressley was very upset that this time he would testify prior to the defendant, unlike in 1996, when Pressley testified last and had the benefit of hearing defendant’s testimony first). Further admitted that Pressley believed that any admission to an on-going sexual relationship would not only discredit his current testimony but also discredit his prior testimony in 1996, 2001, and renew the Board’s suspicions in 1996 that Pressley had attempted to “influence” defendant’s testimony through the personal relationship.
19. Admitted to the extent that Pressley convinced defendant that she needed to testify “consistently” with Pressley’s false testimony that the sexual relationship had ended and that contrary testimony would deny Pressley his law license and therefore deny their daughter the father she needed to have in her life.
20. Admitted.
21. Admitted.
22. Admitted.

23. Admitted and further that, Pressley's conduct was contrary to his daughter's best interest following the Board's hearing and defendant filed a civil action To Establish Paternity in December 2001, realizing that Pressley had little interest in addressing any long-standing issues regarding his daughter and their relationship.
24. Admitted, and by way of further answer; defendant and Pressley attended private custody mediation in June 2002 and in July 2002, defendant dismissed paternity action and filed paternity, custody and child support action. After defendant disclosed pending actions to the BOLE, Pressley's 2002 application was again sealed and brought before the full Board in October 2003. Defendant was not subpoenaed and received notice that she would not be called to testify, however, defendant contacted Fred Parker, BOLE, and revealed information for Mr. Parker's review, which consequently, caused him to issue a subpoena for defendant to testify. Defendant appeared at the scheduled Board hearing in October 2003, prepared to testify to the truth, however, once Pressley realized that defendant would testify, Pressley requested a continuance of the hearing, potentially rescheduled for January 2004. Further, on November 7, 2003, Pressley's wife filed an action for Alienation of Affection and Criminal Conversation against defendant and defendant then counterfiled a Third Party Complaint against Pressley and his wife for Champerty and Maintenance, Civil Conspiracy and Abuse of Process.
25. Admitted, and by way of further answer; between 2002 and 2007, Pressley repeatedly requested continuances for his 2002 Board hearing, however, Fred Parker assured the defendant that she would be subpoenaed for the hearing once it was set.
26. Admitted, and by way of further answer; in October 2007, the defendant openly and voluntarily, unsolicited, revealed the information to the attorney for the Board prior to transcripts of the 2001 hearing being prepared.
27. Admitted to the extent that defendant had been untruthful concerning her sexual relationship with Pressley at the time.
28. Admitted.

**WHEREFORE**, the defendant prays that while the pleadings contain allegations and admissions that may be found to constitute violation(s) of the Revised Rules of Professional Conduct which could incur disciplinary action, the defendant prays that any such mitigating factors or circumstances which are evidenced or indicated will be considered, where appropriate, in defense of said actions and conduct.

This the 16 day of April, 2008.

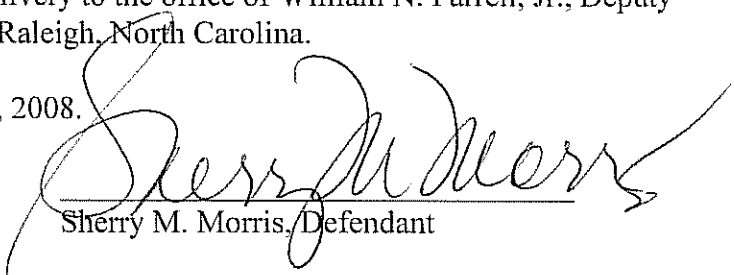
  
Sherry M. Morris Defendant

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Benson, North Carolina 27504  
919-894-1300  
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CERTIFICATE OF SERVICE

This is to certify that I have this day served all parties in this action by filing the original Answer with the Office of the Secretary of the North Carolina State Bar, 208 Fayetteville Street, Raleigh, North Carolina, and by hand delivery to the office of William N. Farrell, Jr., Deputy Counsel, The North Carolina State Bar, Raleigh, North Carolina.

This the 16 day of April, 2008.

  
Sherry M. Morris, Defendant